DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT CORPS OF ENGINEERS
P.O. BOX 532711
LOS ANGELES, CALIFORNIA 90053-2325

REPLY TO
ATTENTION OF

January 15, 2014

Office of the Chief
Planning Division

California Coastal Commission
c/o Sea-level Rise Work Group
45 Fremont Street, Suite 2000
San Francisco, California 94105

Ladies and Gentlemen:

We are providing comments on the "Draft Sea-Level Rise Policy Guidance" Notice published in for public review on October 14, 2013. Our comments are enclosed.

Thank you very much for the opportunity to comment on the draft guidance. Please do not hesitate to call me at (213) 452-3783 or Mr. Larry Smith of my staff at (213) 452-3846 with any questions.

Sincerely,

[redacted]

Josephine R. Axt, Ph.D.
Chief, Planning Division

CALIFORNIA COASTAL COMMISSION DRAFT SEA-LEVEL RISE POLICY GUIDANCE

General Comments

Sea Level Rise Projections We concur with the guidance in the use of multiple sea level rise projections as a means to accommodate the uncertainties inherent in the science of sea level rise predictions. However, we recommend that the lower end of the range be set based on continuation of historical trends. This sets a best-case scenario that we feel cannot be ruled out. We also support the use of a median sea level rise scenario in addition to low and high to allow for a more complete assessment.

Federal Consistency The draft guidance on page 22 acknowledges the need to address sea level rise in planning and permitting decisions and specifically includes federal consistency decisions. However, this is the only reference to federal consistency. This is an area that requires explicit consideration owing to the unique relationship between the Coastal Commission and various federal agencies that are required to make federal consistency determinations and to seek Coastal Commission concurrence.

The US Army Corps of Engineers (Corps) has explicit guidance on how to address sea level rise with which we are required to comply (Circular No. 1165-2-212 1; October 2011. Sea-Level Change Considerations for Civil Works Programs). Our recommendation is that a short section be added to the Coastal Commission's Draft Guidance that recommends that federal agencies seeking concurrence comply with the Coastal Commission Guidance for Coastal Development Permits or its federal equivalent. This avoids conflict between federal and state guidance while addressing the issue.

Ports The draft guidance describes in multiple locations (pp. 32, 36) potential impacts to ports from sea level rise. We feel that the document overestimates potential impacts. Commercial ports, especially the larger ports located in Los Angeles and Long Beach, are very robust facilities with allowances built in to accommodate future expansion that incidentally provide protection from many of the impacts predicted by the draft guidance. Port infrastructure, for example, is built on land that averages +15 to +20 feet mean lower low water (MLLW). This elevation easily accommodates the 5-6 foot current tidal range with room for the maximum sea level rise predictions without flooding. Cargo handling facilities also are overbuilt to accommodate future ship designs providing adequate clearance for sea level rise. Bridges, likewise are built to accommodate vessels larger than currently exist. Bridges that do not are in the process of being replaced now (e.g., the Gerald Desmond Bridge in Long Beach). The Ports of Los Angeles and Long Beach also have only one freshwater input, the relatively short Dominguez Channel that is unlikely to cause flooding problems in the ports.

Impacts to marinas are likewise overstated. Marinas are built with floating docks that adjust to the water level and can accommodate future sea level rise. Shore facilities at marinas, on the other hand, are generally lower than commercial ports and may be susceptible to inundation owing to sea level rise in some of the smaller harbors.

ESHA The draft guidance uses the term "ESHA" several times. The term is not defined or spelled out anywhere in the document, including the Glossary. We request that the term be spelled out in first use and defined in the Glossary.

Specific Comments

II.C.10 p. 25
Includes the following sentence: "If shoreline protection is necessary and allowable under the Coastal Act, use the least-environmentally damaging alternative, incorporate projections of sea-level rise into the design of protection, and limit the time-period of approval, for example, to the life of the structure the device is protecting."

We recommend changing the term "least-environmentally damaging alternative" to "least-environmentally damaging practicable alternative" to be consistent with federal law including the Clean Water Act (33U.S.C. 1251 et seq.).

Concur with use of a range of SLR projections to accommodate uncertainties.

Table 15, Appendix C

The table includes an entry of 6-8 meters as a "Typical Range for CA Coast" for tsunami waves. There is no record of tsunamis this high impacting the California coast. This figure should be corrected to a level supported by the historical record, more likely in the 1-2 meter range.